



1010 Franklin Avenue, Suite 200 | Garden City, NY 11530-2900 | bsk.com

JESSICA C. MOLLER, ESQ.

JMoller@bsk.com

P: 516.267.6332

F: 516.267.6301

September 22, 2021

VIA ECF

Hon. Katherine Polk Failla
United States District Court, S.D.N.Y.
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Vincent Iodice v. ArchCare at Terence Cardinal Cooke Health Care Center; 1199 SEIU United Healthcare Workers East; and Janice Watkins, 20-cv-4217 (KPF)*

Dear Judge Failla:

We represent Defendant ArchCare at Terence Cardinal Cooke Health Care Center ("TCC") with regard to the above-referenced matter. Under the current briefing scheduled ordered by Your Honor, the defendants' are currently required to file their respective motions to dismiss the Third Amended Complaint by Friday, September 24, 2021. However, due to a heavy workload and a personal medical issue that has impacted my ability to finalize TCC's motion to dismiss, I write to request a one-week extension of that filing date such that the briefing schedule for defendants' motions would be amended as follows:

- Defendants' motions to be filed on or before October 1, 2021.
- Plaintiff's opposition to be filed on or before November 1, 2021.
- Defendants' replies to be filed on or before November 15, 2021.

I have consulted with Plaintiff's counsel and also counsel for the Union Defendants, and all counsel have consented to this request. This is the first such request that has been made by any party. Thank you for your consideration of this request.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

A handwritten signature in black ink, appearing to read "J. Moller".

Jessica C. Moller

cc: Marcel Florestal, Esq., Attorney for Plaintiff
Micah Wissinger, Esq., Attorney for the Union Defendants

Application GRANTED. The parties are directed to adhere to the briefing deadlines set forth in the above letter.

Dated: September 23, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE